



Signed and Filed: August 11, 2021

Dennis Montali

DENNIS MONTALI
U.S. Bankruptcy Judge

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER COMPELLING
PRICEWATERHOUSECOOPERS LLP'S
COMPLIANCE WITH RULE 2004
SUBPOENA**

The Court has reviewed all proposed orders and related correspondence submitted by the parties, including the competing proposed order requested by Pricewaterhousecoopers LLP ("PwC"). This Court, having determined that there is just cause for compelling PwC's compliance and orders as follows:

1. Within twenty-one (21) days of the date of this Order, unless otherwise agreed by the Trustee and to the extent such materials have not already been produced by PwC, PwC shall produce to the Trustee all documents and information described at Nos. 1 through 4 of the Trustee's status report of August 2, 2021:

- a. Documents sufficient to identify all of PwC's contracts with PG&E during the time period 2013 through March 17, 2020, excluding any documents PwC knows that have already been produced by PG&E.;
- b. PwC's deliverables relating to the Community Wildfire Safety Program, meaning PwC's work product generated in connection with that engagement, including advice, recommendations, analysis, and/or reports to PG&E, during the time period 2013 through March 17, 2020;
- c. PwC's deliverables relating to the Public Safety Power Shutoff program, meaning PwC's work product generated in connection with that engagement, including advice, recommendations, analysis, and/or reports to PG&E, during the time period 2013 through March 17, 2020; and
- d. PwC's deliverables relating to the EPC Cross-Cutting program, meaning PwC's work product generated in connection with that engagement, including advice, recommendations, analysis, and/or reports to PG&E, during the time period 2013 through March 17, 2020.

2. In the event that PwC withholds any of the above-described documents based on a claim of attorney-client privilege, work-product protection, or any other privilege, whether such privilege is asserted by PG&E or PwC, PwC shall provide a privilege log to the Trustee within twenty-eight (28) days of the date of this Order, unless otherwise agreed by the Trustee, identifying, as demanded by the subpoena: (a) the type, title and subject matter of the Document; (b) the place, date, and manner of preparation of the Document; (c) all authors, addressees, and recipients of the Document, including information about such persons to assess the privilege asserted; and (d) the legal privilege(s) and the factual basis for the claim.

3. No later than 5:00 p.m. PDT on August 19, 2021, the Trustee and PwC shall each submit letter briefs, not to exceed five pages in length, setting forth their respective positions as to the Trustee's request for PwC's deliverables relating to the General Rate Case, meaning PwC's work product generated in connection with that engagement, including advice, recommendations, analysis, and/or reports to PG&E, during the time period 2013 through March 17, 2020.

1 4. This Order is without prejudice to the Trustee's right to seek additional examinations
2 or documents pursuant to Bankruptcy Rule 2004 or any other applicable law.

3
4 ** END OF ORDER **
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28